

The Honorable John H. Chun

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
SEATTLE DIVISION**

SONNY JOYCE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

AMAZON.COM, INC., ANDREW R.  
JASSY, JEFFREY P. BEZOS, BRIAN T.  
OLSAVSKY, DAVID A. ZAPOLSKY, and  
NATE SUTTON,

Defendants.

Case No.: 2:22-cv-00617-JHC

CONSOLIDATED CASES

**STIPULATED MOTION AND ORDER  
EXTENDING TIME TO FILE  
AMENDED COMPLAINT AND  
SETTING BRIEFING SCHEDULE**

ASBESTOS WORKERS PHILADELPHIA  
WELFARE AND PENSION FUND, on  
behalf of itself and all others similarly  
situated,

Plaintiff,

v.

AMAZON.COM, INC., ANDREW R.  
JASSY, BRIAN T. OLSAVSKY, and  
DAVID FILDES,

Defendants.

Case No.: 2:22-cv-00934-JHC

**STIPULATED MOTION AND ORDER  
EXTENDING TIME TO FILE AMENDED  
COMPLAINT AND SETTING BRIEFING  
SCHEDULE**

Case No.: 2:22-cv-00617-JHC

DETECTIVES ENDOWMENT  
ASSOCIATION ANNUITY FUND,  
Individually and On Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

AMAZON.COM, INC., ANDREW R.  
JASSY, BRIAN T. OLSAVSKY, and  
DAVID FILDES,

Defendants.

Case No.: 2:22-cv-00950-JHC

**STIPULATED MOTION EXTENDING  
TIME TO FILE AMENDED COMPLAINT  
AND SETTING BRIEFING SCHEDULE**

Case No.: 2:22-cv-00617-JHC

**STIPULATED MOTION**

Lead Plaintiffs Universal-Investment-Gesellschaft mbH, Universal-Investment-Luxembourg S.A., Menora Mivtachim Insurance Ltd., Menora Mivtachim Pensions and Gemel Ltd., The Phoenix Insurance Company, Ltd., and The Phoenix Provident Pension Fund Ltd., with named plaintiffs Asbestos Workers Philadelphia Welfare and Pension Fund and Detectives Endowment Association Annuity Fund (collectively, “Plaintiffs”), and Defendants Amazon.com., Inc., Jeffrey P. Bezos, Andrew R. Jassy, Brian T. Olsavsky, David A. Zapolsky, Nate Sutton and David Fildes (“Defendants,” and together with Plaintiffs, the “Parties”), respectfully request that the Court enter the proposed order providing for a revised deadline for Plaintiffs to file their Second Consolidated Amended Complaint until February 6, 2024 and setting a schedule that has been agreed-upon by the Parties for subsequent briefing deadlines if Defendants file a motion to dismiss (set forth below).

In support of this request, the Parties state as follows:

**WHEREAS**, on September 20, 2022, Plaintiffs filed their Consolidated Class Action Complaint (“Consolidated Complaint”) (ECF No. 70);

**WHEREAS**, on November 21, 2022, Defendants moved to dismiss the Consolidated Complaint (“Motion,” ECF Nos. 75-76) and the Motion was fully briefed as of March 6, 2023 (ECF Nos. 82-85);

**WHEREAS**, on December 4, 2023, this Court entered its order on the Motion (“Order,” ECF No. 92);

**WHEREAS**, in the Order, the Court dismissed the Consolidated Complaint with leave to replead, granting “Plaintiffs leave until January 16, 2024 to file a second Consolidated Amended Complaint” (Order at 40);

**WHEREAS**, the Parties have met and conferred and agree that a three-week extension to the current deadline for filing of a Second Consolidated Amended Complaint is warranted, after considering the pre-existing obligations of Plaintiffs and their counsel and the upcoming holiday season;

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**STIPULATED MOTION AND ORDER  
EXTENDING TIME TO FILE AMENDED  
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SCHEDULE**

Case No.: 2:22-cv-00617-JHC

**WHEREAS**, the Parties have also agreed, subject to the Court's approval, to set a schedule for subsequent briefing deadlines to Defendants' anticipated motion to dismiss the Second Consolidated Amended Complaint.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and among the Parties, through their respective counsel of record, and subject to Court approval, as follows:

1. Plaintiffs shall file the Second Consolidated Amended Complaint by Tuesday, February 6, 2024.
2. Defendants shall move to dismiss or file their answer to the Second Consolidated Amended Complaint by Monday, April 15, 2024.
3. Plaintiffs shall file their opposition to any motion by Defendants to dismiss the Second Consolidated Amended Complaint by Friday, June 14, 2024.
4. Defendants shall file a reply brief in support of any motion to dismiss by Monday, July 29, 2024.

Stipulated and respectfully submitted this 13th day of December, 2023.

Respectfully submitted,

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*Counsel for the Detectives Endowment  
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**ORDER**

THIS MATTER came before the Court on the Stipulated Motion Extending Time To File Amended Complaint and Setting Briefing Schedule (“Stipulated Motion”), filed jointly by Lead Plaintiffs Universal-Investment-Gesellschaft mbH, Universal-Investment-Luxembourg S.A., Menora Mivtachim Insurance Ltd., Menora Mivtachim Pensions and Gemel Ltd., The Phoenix Insurance Company, Ltd., and The Phoenix Provident Pension Fund Ltd., with named plaintiffs Asbestos Workers Philadelphia Welfare and Pension Fund and Detectives Endowment Association Annuity Fund (collectively, “Plaintiffs”), and Defendants Amazon.com., Inc., Jeffrey P. Bezos, Andrew R. Jassy, Brian T. Olsavsky, David A Zapolsky, Nate Sutton and David Fildes, (“Defendants,” and together with Plaintiffs, the “Parties”).

Having reviewed the Parties’ Stipulated Motion and for good cause shown, the Court hereby GRANTS the Stipulated Motion and set forth the following schedule:

1. Plaintiffs shall file the Second Amended Consolidated Complaint on Tuesday, February 6, 2024.
2. Defendants shall move to dismiss or file their answer to the Second Consolidated Amended Complaint on Monday, April 15, 2024.
3. Plaintiffs shall file their opposition to any motion by Defendants to dismiss the Second Consolidated Amended Complaint on Friday, June 14, 2024.
4. Defendants shall file a reply brief in support of any motion to dismiss on Monday, July 29, 2024.

**IT IS SO ORDERED.**

DATED this 13th day of December, 2023.

  
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THE HONORABLE JOHN H. CHUN  
UNITED STATES DISTRICT JUDGE

**STIPULATED MOTION AND ORDER  
EXTENDING TIME TO FILE AMENDED  
COMPLAINT AND SETTING BRIEFING  
SCHEDULE**

Case No.: 2:22-cv-00617-JHC